

IN THE UNITED STATES DISTRICT COURT FOR THE ~~WESTERN~~ *✓* D.C.  
DISTRICT OF TENNESSEE, EASTERN DIVISION

05 DEC -2 PM 2:46

JACOB RHODES, et al.

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W/D OF TN, MEMPHIS

Plaintiffs,

vs.

No. 04-1191-T/P

SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,

Defendants,

---

BRYAN MOONEY, et al.,

Plaintiffs,

vs.

No. 04-1190-T/P

SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,

Defendants,

---

ZACHARY ROBBINS, et al.

Plaintiffs,

vs.

No. 04-1294-T/P *✓*

SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,

Defendants,

RECEIVED  
05 DEC -6 PM 12:29  
THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W/D OF TN, MEMPHIS

**DALTON DYER, et al.,**

**Plaintiffs,**

**vs.**

**No. 05-1004-T/P**

**SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,**

**Defendants,**

---

**HALEY NICOLE RHODES, et al.,**

**Plaintiffs,**

**vs.**

**No. 05-1020-T/P**

**SUSAN WALLACE, Individually, and  
HENDERSON COUNTY BOARD  
OF EDUCATION,**

**Defendants,**

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#### **AGREED PROTECTIVE ORDER**

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It appearing to the Court, as evidenced by the signatures herein below of counsel for the respective parties to this cause, that the parties have agreed that the production of the following described records and documents should be subject to this Agreed Protective Order:

1. Any and all records relating to any minor, whether produced by Plaintiffs or Defendants;
2. The psychological/psychiatric records of any party;
3. The medical records of any party;

4. TBI, DCS or other governmental investigation records relating to any minor or Susan Wallace; and
5. The academic records of any minor.

All records produced by any and all parties that are subject to this Protective Order shall be used for these cases only and for no other purpose. At the conclusion of this case, all such records shall be returned to the party that originally produced them, or shall be destroyed.

The introduction of these records at trial shall be subject to the Federal Rules of Evidence, and nothing in this Order shall restrict the use of the records at the trials of the above-styled cases.

This Agreed Protective Order may be amended by agreement or by Motion for good cause shown.

Entered this 2 day of December, 2005

  
\_\_\_\_\_  
JUDGE

APPROVED FOR ENTRY:

Respectfully submitted,

SPRAGINS, BARNETT, COBB & BUTLER, PLC

By: 

J. BRANDON MCWHERTER #21600

LEWIS L. COBB #5369

312 East Lafayette Street

P.O. Box 2004

Jackson, TN 38302

(731) 424-0461

Attorneys for Plaintiffs

RAINEY, KIZER, REVIERE & BELL

By: Dale Thomas by JBM  
RUSTY REVIERE  
DALE THOMAS  
105 S. Highland  
Jackson, TN 38301  
(731) 423-2414

and

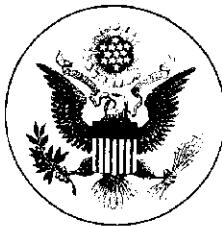
LAW OFFICE OF BRENTWOOD  
LARRY L. CRAIN  
5214 Maryland Way, Suite 402  
Brentwood, TN 37027  
(615) 376-2600

Attorneys for Defendant, Susan Wallace

WALDROP & HALL, P.A.

By: Charles Purcell by JBM  
CHARLES M. PURCELL, #12461  
JENNIFER K. CRAIG, #20036  
106 S. Liberty Street  
Jackson, TN 38301  
(731) 424-6211

Attorneys for Defendant, Henderson County  
Board of Education



# Notice of Distribution

This notice confirms a copy of the document docketed as number 61 in case 1:04-CV-01294 was distributed by fax, mail, or direct printing on December 7, 2005 to the parties listed.

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Russell E. Reviere  
RAINEY KIZER REVIERE & BELL  
209 E. Main Street  
Jackson, TN 38302--114

Lewis L. Cobb  
SPRAGINS BARNETT COBB & BUTLER  
312 East Lafayette St.  
Jackson, TN 38302--200

Charles M. Purcell  
WALDROP & HALL  
106 S. Liberty Street  
P.O. Box 726  
Jackson, TN 38302--072

James Brandon McWherter  
SPRAGINS BARNETT COBB & BUTLER  
P.O. Box 2004  
Jackson, TN 38302--200

R. Dale Thomas  
RAINEY KIZER BUTLER REVIERE & BELL  
209 East Main Street  
Jackson, TN 38302--114

Clinton H. Scott  
SPRAGINS BARNETT COBB & BUTLER  
312 East Lafayette St.  
Jackson, TN 38302--200

Jennifer Craig  
WALDROP & HALL  
106 S. Liberty Street  
P.O. Box 726  
Jackson, TN 38302--072

Honorable James Todd  
US DISTRICT COURT